

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

BILLY PASLEY and MYRA GREEN,)	CIVIL ACTION FILE
)	NO. 4:20-cv-00124-HLM-WEJ
Plaintiffs,)	
)	
v.)	JURY TRIAL DEMANDED
RELOGIO, LLC; RECUPERO, LLC;)	
AGORA NOTUS, LLC; COMPLETE)	
PROPERTIES, LLC; CC LICENSING,)	
LLC; COMPLETE AVIATION, LLC;)	
TROVAMI, LLC; COMPLETE)	
CASH HOLDINGS, LLC; SIC)	
CERTIOR TRUST; and TRACI)	
ZIRKELBACH,)	
)	
Defendants)	
)	

NOTICE OF DEPOSITION OF TRACI ZIRKELBACH

To: Traci Zirkelbach
c/o David G. Archer
Archer & Lovell, PC
P.O. Box 1024
Cartersville, GA 30120
sherryabernathy11@gmail.com

Please take notice that due to the disruptions to travel and accompanying shelter-in-place orders and the Centers for Disease Control guidelines governing group gatherings caused by the COVID-19 pandemic, the deposition of **TRACI ZIRKELBACH** will be taken via remote means on April 22, 2021 upon oral

examination pursuant to Federal Rules of Civil Procedure 30 and 45. This deposition will commence at 9:30 am.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 1075 Peachtree Street, Suite 3625, Atlanta, Georgia 30309. Contact Veritext's calendar team at calendar-ga@veritext.com to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require for carrying out the virtual deposition.

The deponent and all persons taking the deposition, defending the deposition, or questioning the deponent at the deposition must appear by videoconference utilizing a computer, laptop, smart phone, or tablet equipped with both a microphone and a camera. Those who wish to appear in the physical presence of another do so at their own election; however, this noticing party is not requiring the in-person physical attendance of counsel, the witness or any other party to this action. The deposition will be taken, via remote means, before an officer authorized to administer the oath to the deponent. That officer will be remote from the deponent. The deposition may be videotaped.

NOTICE IS FURTHER GIVEN that we reserve the right to conduct this deposition utilizing the secure web-based deposition option afforded by

Veritext or in the alternative video teleconferencing (VTC) services to provide remote/virtual access for those parties wishing to participate in the deposition via the internet. Also take notice that we reserve the right to record the deposition either by stenographic means by a court reporter certified to record depositions or a digital reporter utilizing state-of-the-art digital recording equipment. Both the court reporter and digital reporter are authorized to administer the oath and serve as the deposition officer in the State of Georgia. Take note that the deposition officer will also be remote and out of the presence of the deponent via one of the options above for the purposes of providing the oath/affirmation to the deponent and capturing the proceeding. We further reserve the right to utilize the following:

- (1) Record the deposition utilizing audio or video technology; (2) Instant visual display such that the reporter's writing of the proceeding will be available to all who are a party to this proceeding to request and receive it in realtime; (3) Exhibit Capture (picture-in-picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually; and (4) To conduct this deposition utilizing a paperless exhibit display process called Exhibit Share or a similar paperless virtual display platform. The parties are advised that in lieu of a paper set of exhibits they may be provided and displayed digitally to the

deposition officer, deponent, parties and counsel. The exhibits will be compiled by the deposition officer for the purposes of exhibit stamping, and ultimate production of the final certified transcript.

Please contact the noticing attorney prior to the deposition so that the necessary credentials, call-in numbers, firm name, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Respectfully submitted this 7th day of April 2021.

LEGARE, ATTWOOD & WOLFE, LLC

/s/ Eleanor M. Attwood

Eleanor M. Attwood
Georgia Bar No. 514014
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Counsel for Plaintiff

Attorney for Plaintiff

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Defendants)	
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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2021, I electronically filed the **NOTICE DEPOSITION OF TRACI ZIRKELBACH**, with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

David G. Archer
sherryabernathy11@gmail.com
Chris Twyman
chris.twyman@cbtlaw.com

West Evans
west.evans@cbtjlaw.com

LEGARE, ATTWOOD & WOLFE, LLC

/s/ Eleanor M. Attwood

Eleanor M. Attwood
Georgia Bar No. 514014